

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANN LYSE,

Defendant.

No. 3:20-cv-6152

COMPLAINT

Plaintiff, the United States of America, by and through its undersigned attorneys, brings this complaint against Defendant ANN LYSE, and alleges the following:

I. NATURE OF THIS ACTION

1. Starting as early as July 2019 and continuing to the present, Defendant has conducted financial transactions with large sums of illegally obtained money, knowing that her transactions are designed to conceal the nature, source, location, ownership, and control of proceeds. Defendant's conduct includes knowingly receiving money obtained via fraud and then immediately transmitting the same money to accomplices. Defendant has transmitted money to and from accomplices in Jamaica and the United States.

2. The United States seeks to prevent continuing and substantial injury to the United States and victims by bringing this action for a permanent injunction and other equitable relief under 18 U.S.C. § 1345. The United States seeks to enjoin the ongoing commission of banking law violations as defined in 18 U.S.C. § 3322(d), including money laundering in violation of 18 U.S.C. § 1956(a)(1)(B), international money laundering in violation of 18 U.S.C. § 1956(a)(2)(B), and structuring cash transactions to evade transaction reporting requirements in violation of 31 U.S.C. § 5324(a).

II. JURISDICTION AND VENUE

3. This Court has jurisdiction over this action under 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345.

4. The United States District Court for the Western District of Washington is a proper venue for this action under 28 U.S.C. § 1391(b)(1) & (b)(2) because Defendant is a resident of this District and because a substantial part of the events or omissions giving rise to this Complaint occurred in this District.

III. PARTIES

5. Plaintiff is the United States.

6. Defendant Ann Lyse is a resident of this District, residing in Lacey, Washington. In connection with the matters alleged herein, Defendant transacts and has transacted business in this District.

IV. FACTS

A. Defendant's Ongoing Banking Law Violations

7. Defendant conducts financial transactions to benefit one or more international fraud schemes, knowing that the moneys she receives and transmits are obtained fraudulently,

1 knowing that her transactions are designed to conceal the schemes, and structuring her cash
2 transactions in an effort to prevent the filing of required financial transaction reports.

3 Defendant receives financial compensation for this conduct, by transmitting to an accomplice
4 slightly smaller amounts than she receives and keeping the difference for herself.

5 **(I) Money laundering and international money laundering**

6 8. Beginning at least as early as 2019, Defendant has knowingly and willingly
7 accepted tens of thousands of dollars from multiple sources and then transmitted most of that
8 money to accomplices.

9 9. Defendant was reportedly contacted in June of 2019 from someone claiming to
10 be from Publisher's Clearing House, stating that she had won a lottery prize but that she needed
11 to pay fees to collect her winnings. Defendant paid those purported fees. Shortly thereafter,
12 she received \$10,000 in her bank account. She was instructed to send that money in order to
13 collect her winnings. She later learned that the \$10,000 was in actuality a cash advance from
14 her credit card.

15 10. Defendant also received Express Mail packages from multiple locations across
16 the United States, including Georgia, Maryland, Tennessee, California, and South Carolina.
17 These packages contained payments from victims of other fraud schemes. Defendant then
18 facilitated these schemes by depositing and transferring these payments, knowingly providing
19 accomplices in Jamaica and the United States access to her accounts to access these funds.

20 11. Defendant suspected that the packages she received were part of a scam and
21 believed that at least some of the individuals with whom she was in contact with were
22 defrauding her. She nevertheless continued to facilitate these payments as instructed.

23 12. On or about July 29 and July 30, 2019, Defendant entered three different Wells
Fargo branches, where she maintained checking and savings accounts, at locations in Lacey,

1 WA and Olympia, WA. She conducted five cash withdrawals in amounts ranging from \$300 to
2 \$5,000 for a total of \$18,500. Wells Fargo reported a potential structuring of withdrawals to
3 avoid a currency transaction report (CTR).

4 13. Between September and October 2019, Defendant made a series of cash and
5 check deposits at Bank of America, where she had accounts at that time totaling approximately
6 \$46,143. Funds were removed from the account via cash withdrawals made in Washington
7 State, ATM locations in Jamaica, and online payments to Defendant's credit card. Bank of
8 America reviewed login information to determine that the online account was predominately
9 accessed at locations in Jamaica. Bank of America subsequently closed Defendant's account.

10 14. Between March 2020 and May 2020, Defendant opened checking and savings
11 account with KeyBank. KeyBank monitored transactions through Peer-2-Peer (*e.g.* Zelle) and
12 online transactions originating from Jamaica. KeyBank questioned Defendant about these
13 activities and Defendant stated that she provided her account information to a friend in Jamaica
14 and they were going to make a deposit to her account. Multiple withdrawals were made, but
15 not completed due to non-sufficient funds. KeyBank closed Defendant's accounts.

16 15. In August 2019, Defendant opened accounts with Olympia Credit Union and
17 attempted to secure a \$16,000 personal loan but was unable to do so because she refused to
18 provide an itemized list of debts.

19 16. In July 2020, Defendant attempted to deposit a third-party check for
20 approximately \$8,000 with Olympia Credit Union; the third party had no identifiable
21 relationship with Defendant. Olympia Credit Union refused to deposit the check after
22 Defendant explained the check was for fees to secure winnings from Publisher's Clearing
23

1 House. The next day, two checks attempted to clear Defendant's account for a total of
2 approximately \$11,400, but were returned as non-sufficient funds.

3 17. On or about August 2, 2020, Defendant deposited \$3,000 in cash at an Olympia
4 Credit Union ATM. Olympia Credit Union stated to Defendant that they were going to hold
5 the deposit for ten days based on the recent deposit history. Defendant stated she was
6 concerned that her contact with Publisher's Clearing House will be upset because she had been
7 instructed to deposit the funds and then forward them to another contact in California.

8 18. On or about August 6, 2020, Defendant deposited a \$7,000 check from an out-
9 of-state third party; the third party had no identifiable relationship to Defendant. Olympia
10 Credit Union questioned Defendant about the suspicious nature of the funds but Defendant
11 insisted the bank deposit the funds. Olympia Credit Union verified and deposited the funds.
12 Defendant then withdrew \$5,000 in cash.

13 19. On or about August 7, 2020, Defendant attempted to deposit approximately
14 \$6,000 in combined funds from multiple checks from multiple remitters. Olympia Credit
15 Union's Fraud Department questioned Defendant. Defendant stated that she didn't know who
16 the checks were from, but that she was told to deposit them and send the funds to third parties.
17 Olympia Credit Union repeated that it appeared Defendant was involved in a scam and refused
18 to accept the deposits.

19 20. On or about September 19, 2020, Defendant attempted to deposit a \$1,350
20 deposit from an out-of-state third party, who had not identifiable relationship with Defendant.
21 The out-of-state check was returned stop pay. Olympia Credit Union then closed Defendant's
22 checking account based on the history of repeated returned check deposits.
23

1 **(2) Structuring**

2 21. Defendant engaged in conduct designed to cause domestic financial institutions
3 to fail to file a report required under 31 U.S.C. § 5313(a), and the regulations promulgated
4 thereunder. Defendant repeatedly caused and attempted to cause her cash withdrawals, and
5 those of her relative, to be structured in amounts designed to avoid this transaction reporting
6 requirement.

7 22. For example, in July 2019, Wells Fargo Bank reported that Defendant withdrew
8 a total of \$18,500 at three different branches, in five different transactions, in order to avoid a
9 transaction reporting requirement.

10 23. For further example, between September and October 2019, Defendant made
11 numerous check deposits that totaled over \$46,143, and additional cash deposits, in structured
12 amounts in order to avoid transaction reporting requirements.

13 **B. Defendant's Knowledge of Fraud; Intent to Conceal the Nature, Source, Location,**
14 **Ownership, or Control of Proceeds; and Intent to Evade Transaction Reporting**
15 **Requirements**

16 24. On information and belief, Defendant has engaged in the financial transactions
17 alleged in Paragraphs 7 through 23 with the knowledge that the moneys she receives from and
18 transmits to accomplices are obtained by fraud schemes or other specified unlawful activity.

19 25. On information and belief, Defendant has engaged in the financial transactions
20 alleged in Paragraphs 7 through 23 with the intent to conceal the nature, source, location,
21 ownership, or control of proceeds.

22 26. On information and belief, Defendant has engaged in the financial transactions
23 alleged in Paragraphs 7 through 23 with the intent to evade transaction reporting requirements.

28. For further example, financial institutions alerted Defendant that her financial transactions appeared to be suspicious and indicative of fraud. Multiple financial institutions closed Defendant's accounts because of this suspicious behavior. Nevertheless, Defendant continued to open new accounts and facilitate the financial transactions with each new account.

9 29. Defendant also stated multiple times that she was working with individuals
10 outside the United States, including in Jamaica, and sending and receiving money from these
11 individuals.

12 C. Harm to the United States

13 30. The United States is suffering continuing and substantial injury from
14 Defendant's banking law violations.

31. Defendant is continuing to facilitate her banking law violations. Absent injunctive relief by this Court, Defendant will continue to cause continuing and substantial injury to the United States and victims.

COUNT I
(18 U.S.C. § 1345 – Injunctive Relief)

32. The United States re-alleges and incorporates by reference Paragraphs 1 through 31 of this Complaint as though fully set forth herein.

33. By reason of the conduct described herein, Defendant has committed, is committing, and is about to commit banking law violations as defined in 18 U.S.C. § 3322(d), including money laundering with intent to conceal in violation of 18 U.S.C. § 1956(a)(1)(B)(i),

1 money laundering with intent to evade transaction reporting requirements in violation of
2 18 U.S.C. § 1956(a)(1)(B)(ii), international money laundering with intent to conceal in
3 violation of 18 U.S.C. § 1956(a)(2)(B)(i), international money laundering with intent to evade
4 transaction reporting requirements in violation of 18 U.S.C. § 1956(a)(2)(B)(ii), and structuring
5 cash transactions to evade transaction reporting requirements in violation of 31 U.S.C. § 5324.

6 34. Because Defendant is committing or about to commit banking law violations as
7 defined in 18 U.S.C. § 3322(d), the United States is entitled, under 18 U.S.C. § 1345, to seek a
8 permanent injunction restraining all future banking law violations and any other action that this
9 Court deems just to prevent a continuing and substantial injury to the United States.

10 35. As a result of the foregoing, Defendant's conduct should be enjoined pursuant to
11 18 U.S.C. § 1345.

12 VI. PRAYER FOR RELIEF

13 WHEREFORE, Plaintiff, United States of America, requests of the Court the following
14 relief:

15 A. That the Court issue a permanent injunction, pursuant to 18 U.S.C. § 1345,
16 ordering that Defendant is restrained from engaging, participating, or assisting in money
17 laundering, international money laundering, structuring transactions to evade transaction
18 reporting requirements, and any money transmitting business; and

19 B. That the Court order such other and further relief as the Court shall deem just
20 and proper.

21 //

22 //

Respectfully submitted this 24th day of November, 2020.

BRIAN T. MORAN
United States Attorney

s/ Nickolas Bohl
NICKOLAS BOHL, WSBA #48978
Assistant United States Attorney
United States Attorney's Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: 206-553-7970
Fax: 206-553-4067
Email: nickolas.bohl@usdoj.gov

Counsel for United States of America

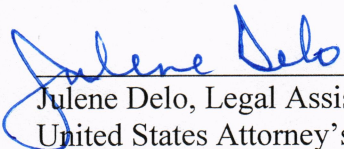
CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Western District of Washington and is the person of such age and discretion as to be competent to serve papers;

It is further certified that on this day, I mailed by United States Postal Service said pleading to Defendant, addressed as follows:

Ann Lyse
4509 Montclair Dr SE
Lacey, WA 98503

Dated this 24th day of November, 2020.



Julene Delo, Legal Assistant
United States Attorney's Office
700 Stewart St., Ste. 5220
Seattle, WA 98101
Phone: 253-428-3800
Fax: 253-428-3826
E-mail: julene.delo@usdoj.gov

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
AUSA Nickolas Bohl, United States Attorney's Office
700 Stewart Street, Suite 5220, Seattle, WA 98101,
206-553-7970

DEFENDANTS

ANN LYSE

County of Residence of First Listed Defendant Thurston
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
18 U.S.C. § 1345
Brief description of cause:
Injunction for structuring, money laundering, fraud

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE DOCKET NUMBER

DATE 11/24/2020 SIGNATURE OF ATTORNEY OF RECORD s/ Nickolas Bohl

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANN LYSE

Defendant.

NO. _____

**[PROPOSED] CONSENT DECREE AND
FINAL JUDGMENT**

CONSENT DECREE AND FINAL JUDGMENT

Plaintiff, United States of America ("Plaintiff"), commenced the above-captioned action in this Court with a complaint pursuant to 18 U.S.C. § 1345, alleging that Defendant, Ann Lyse, is committing or about to commit a banking law violation as defined in 18 U.S.C. § 3322(d), including international money laundering in violation of 18 U.S.C. § 1956(a)(2)(B).

Plaintiff and Defendant, *pro se*, wish to resolve Plaintiff's allegations without litigation and jointly request and consent to the entry of this Consent Decree and Final Judgment ("Consent Decree") without Defendant's admission of liability or wrongdoing. Defendant agrees to waive service of the Summons and the Complaint.

1 Defendant has entered into this Consent Decree freely and without coercion. Defendant
2 further acknowledges that she has read the provisions of this Consent Decree, understands them,
3 and is prepared to abide by them.

4 **IT IS HEREBY ADJUDGED, ORDERED, AND DECREED as follows:**

5 1. This Court has jurisdiction over this matter and the parties pursuant to
6 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345. Venue is proper in this District under
7 28 U.S.C. § 1391(b) and (c).

8 2. Defendant neither admits nor denies the allegations in the Complaint. Only for
9 purposes of this action, Defendant admits the facts necessary to establish jurisdiction.

10 3. For purposes of this Consent Decree:

11 a. “Defendant” means Ann Lyse.

12 b. “Person” means an individual, a corporation, a partnership, or any other
13 entity.

14 c. “Funds” include any currency, check, money order, stored value card,
15 stored value card numbers, bank wire transmission, or other monetary value.

16 d. “Money transmitting business” refers to a person who, for a fee, receives
17 funds from one person for the purpose of transmitting the funds, or providing access to the
18 funds, to another person.

19 e. “Fee” refers to a payment or compensation of any kind regardless of how
20 the payment or compensation is labeled, including but not limited to processing fees,
21 service fees, expediting fees, purchase fees, nominal fees, symbolic payments, gifts and
22 gratuities.
23

1 4. Upon entry of this Decree, Defendant is permanently prohibited and enjoined
2 from, directly or indirectly, assisting, facilitating, or participating in any money transmitting
3 business.

4 5. Within five (5) days after entry of this Consent Decree, the Defendant is ordered
5 to submit to Postal Inspector Amy Kerkof a written acknowledgement of receipt of this Consent
6 Decree sworn under penalty of perjury. The statement shall be addressed to:

7 U.S. Postal Inspector Amy Kerkof
8 U.S. Postal Inspection Service
9 P.O. Box 400
 Seattle, WA 98111
 206-442-6132 (desk)

10 6. The Consent Decree shall not be modified except in writing by Plaintiff and the
11 Defendant and approved by the Court.

12 7. This Consent Decree shall constitute a final judgment and order in this action.

13 8. This Court retains jurisdiction of this action for the purpose of enforcing or
14 modifying this Consent Decree and for the purpose of granting such additional relief as may be
15 necessary or appropriate.

16
17 **DONE AND ORDERED** in Chambers at Seattle, Washington, this _____ day of

18 _____, 2020.
19
20
21
22
23

APPROVED AND ENTERED BY THIS COURT

Dated this ____ day of _____, 2020.

HONORABLE _____
United States District Judge

We hereby consent to the entry of the foregoing Decree:

FOR DEFENDANT ANN LYSE

Dated: Oct. 30, 2020

Ann Lyse
ANN LYSE

FOR PLAINTIFF THE UNITED STATES OF AMERICA

BRIAN MORAN
United States Attorney

Dated: November 24, 2020

By: s/ Nickolas Bohl
NICKOLAS BOHL, WA #48978
Assistant United States Attorney
United States Attorney's Office
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